

1 WILLIAM A. ISAACSON (Admitted *Pro Hac Vice*)  
(wisaacson@bsfllp.com)

2 BOIES, SCHILLER & FLEXNER LLP  
3 5301 Wisconsin Ave, NW, Washington, DC 20015  
Telephone: (202) 237-2727; Fax: (202) 237-6131

4 JOHN F. COVE, JR (Admitted *Pro Hac Vice*)  
(jcove@bsfllp.com)  
5 BOIES, SCHILLER & FLEXNER LLP  
6 1999 Harrison Street, Suite 900, Oakland, CA 94612  
Telephone: (510) 874-1000; Fax: (510) 874-1460

7 RICHARD J. POCKER #3568  
(rpocker@bsfllp.com)  
8 BOIES, SCHILLER & FLEXNER LLP  
9 300 South Fourth Street, Suite 800, Las Vegas, NV 89101  
10 Telephone: (702) 382-7300; Fax: (702) 382-2755

11 DONALD J. CAMPBELL #1216  
(djc@campbellandwilliams.com)  
12 J. COLBY WILLIAMS #5549  
(jcw@campbellandwilliams.com)  
13 CAMPBELL & WILLIAMS  
14 700 South 7th Street, Las Vegas, NV 89101  
Telephone: (702) 382-5222; Fax: (702) 382-0540

15 *Attorneys for Defendant Zuffa, LLC, d/b/a*  
16 *Ultimate Fighting Championship and UFC*

17 *Additional counsel on signature page*  
18

19 UNITED STATES DISTRICT COURT

20 DISTRICT OF NEVADA

21 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
22 Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
23 others similarly situated,

24 Plaintiffs,

25 v.

26 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

27 Defendant.  
28

Case No.: 2:15-cv-01045-RFB-(PAL)

**STIPULATION TO RESET THE APRIL  
25, 2016 JOINT STATUS CONFERENCE  
FOR MAY 3, 2016**

1 Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and  
2 Kyle Kingsbury (collectively "Plaintiffs") and Defendant Zuffa, LLC d/b/a Ultimate Fighting  
3 Championship and UFC ("Zuffa") (together with Plaintiffs, "the Parties") file this Stipulation to  
4 Reset the April 25, 2016, Status Conference and hearing on the pending Plaintiffs' Motion to  
5 Challenge Defendant's Privilege Designations (Dkt. 229), currently scheduled for April 25, 2016,  
6 to May 3, 2016.

7 On February 23, 2016, the Parties and the Court scheduled a Status Conference for April  
8 25, 2016, to update the Court about the Parties' ongoing meet and confer process regarding the  
9 application of search terms to Defendant's Electronically Stored Information and any other  
10 outstanding discovery matters. On April 1, 2016, Plaintiffs filed a Motion to Challenge Zuffa's  
11 Privilege Designation. That Motion was set for hearing on the date of the next Status Conference,  
12 April 25, 2016, for the convenience of the Court and the Parties.

13 Since the last Status Conference, the Parties have continued to meet and confer regarding  
14 the Defendant's ESI, methods to reduce the ESI, the application of search terms, and the testing  
15 results based on the Parties' efforts. The Parties have recently agreed on additional de-  
16 duplication methods and other narrowing proposals, which Zuffa's vendor is applying. However,  
17 based on the estimates of Zuffa's vendor, the data on the effects of the Parties' processes will not  
18 be available and, the Parties' believe, reasonably analyzed until after the Status Conference  
19 scheduled for April 25, 2016. Therefore, the Parties believe that it would be more efficient and  
20 productive to reschedule the pending Joint Status Hearing and the hearing on Plaintiffs' Motion to  
21 Challenge Zuffa's Privilege Designation for May 3, 2016, subject to the Court's convenience, in  
22 order to allow the Parties to analyze the data, continue to meet and confer and to present more  
23 complete information to the Court in the Parties' forthcoming Joint Status Report.

24 The Parties have contacted the Courtroom Administrator and stipulate to resetting the  
25 Joint Status Conference and hearing for the Motion to Challenge to May 3, 2016.  
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1 Dated: April 15, 2016

BOIES, SCHILLER & FLEXNER LLP

2  
3 By: /s/ John F. Cove, Jr.

John F. Cove, Jr.

4 Attorneys for Defendant Zuffa, LLC, d/b/a  
5 Ultimate Fighting Championship and UFC

6 John F. Cove, Jr. (*Pro Hac Vice*)  
BOIES, SCHILLER & FLEXNER LLP  
7 1999 Harrison Street, Suite 900  
Oakland, CA 94612  
8 Tel: (510) 874-1000  
9 Fax: (510) 874-1460  
Email: jcove@bsflp.com

10 William A. Isaacson (*Pro Hac Vice*)  
11 BOIES, SCHILLER & FLEXNER LLP  
12 5301 Wisconsin Ave, NW  
Washington, DC 20015  
13 Tel: (202) 237-2727  
Fax: (202) 237-6131  
14 Email: wisaacson@bsflp.com

15 Donald J. Campbell #1216  
16 J. Colby Williams #5549  
CAMPBELL & WILLIAMS  
17 700 South 7th Street  
Las Vegas, Nevada 89101  
18 Tel: (702) 382-5222  
Fax: (702) 382-0540  
19 Email: djc@campbellandwilliams.com  
20 jcw@campbellandwilliams.com

21 Richard J. Pocker #3568  
22 BOIES, SCHILLER & FLEXNER LLP  
300 South Fourth Street, Suite 800  
23 Las Vegas, NV 89101  
Tel: (702) 382 7300  
24 Fax: (702) 382 2755  
Email: rpocker@bsflp.com

25  
26 Attorneys for Defendant Zuffa, LLC, d/b/a Ultimate  
27 Fighting Championship and UFC  
28

1  
2 Dated: April 15, 2016

Respectfully Submitted,

3 By: /s/ Michael Dell' Angelo  
Michael Dell' Angelo

4 Don Springmeyer (Nevada Bar No. 1021)  
5 Bradley S. Schrager (Nevada Bar No. 10217)  
6 Justin C. Jones (Nevada Bar No. 8519)  
7 WOLF, RIFKIN, SHAPIRO, SCHULMAN &  
8 RABKIN, LLP  
9 3556 E. Russell Road, Second Floor  
Las Vegas, Nevada 89120  
(702) 341-5200/Fax: (702) 341-5300  
dspringmeyer@wrslawyers.com  
bschrager@wrslawyers.com  
jjones@wrslawyers.com

10 ***Co-Lead Class Counsel:***

11 Eric L. Cramer  
12 Michael Dell' Angelo  
13 Patrick Madden  
14 BERGER & MONTAGUE, P.C.  
15 1622 Locust Street  
16 Philadelphia, PA 19103  
17 Telephone: (215) 875-3000  
18 Facsimile: (215) 875-4604  
19 ecramer@bm.net  
20 mdellangelo@bm.net  
21 pmadden@bm.net  
22  
23  
24  
25  
26  
27  
28

Joseph R. Saveri  
Joshua P. Davis  
Matthew S. Weiler  
Kevin E. Rayhill  
JOSEPH SAVERI LAW FIRM, INC.  
505 Montgomery Street, Suite 625  
San Francisco, California 94111  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
jsaveri@saverilawfirm.com  
jdavis@saverilawfirm.com  
mweiler@saverilawfirm.com  
krayhill@saverilawfirm.com

Benjamin D. Brown  
Richard A. Koffman  
Hiba Hafiz  
COHEN MILSTEIN SELLERS & TOLL,  
PLLC  
1100 New York Ave., N.W., Suite 500, East  
Tower Washington, DC 20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408 4699  
bbrown@cohenmilstein.com  
hhafiz@cohenmilstein.com

***Additional Counsel for the Classes:***

Robert C. Maysey  
Jerome K. Elwell  
WARNER ANGLE HALLAM JACKSON &  
FORMANEK PLC  
2555 E. Camelback Road, Suite 800  
Phoenix, AZ 85016  
Telephone: (602) 264-7101  
Facsimile: (602) 234-0419  
rmaysey@warnerangle.com  
jelwell@warnerangle.com

Eugene A. Spector  
Jeffrey J. Corrigan  
William G. Caldes  
SPECTOR ROSEMAN KODROFF & WILLIS,  
P.C.  
1818 Market Street – Suite 2500  
Philadelphia, PA 19103  
Telephone: (215) 496-0300  
Facsimile: (215) 496-6611  
espector@srkw-law.com  
jcorrigan@srkw-law.com  
bcaldes@srkw-law.com

Frederick S. Schwartz  
LAW OFFICE OF FREDERICK S.  
SCHWARTZ  
15303 Ventura Boulevard, #1040  
Sherman Oaks, CA 91403  
Telephone: (818) 986-2407  
Facsimile: (818) 995-4124  
fred@fredschwartzlaw.com

*Attorneys for Individual and Representative  
Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,  
Luis Javier Vazquez, Brandon Vera, and Kyle  
Kingsbury*

**ATTESTATION OF FILER**

The signatories to this document are myself and Michael Dell'Angelo, and I have obtained Mr. Dell'Angelo's concurrence to file this document on his behalf.

Dated April 15, 2016

By: /s/ John F. Cove, Jr.

John F. Cove, Jr. (*Pro Hac Vice*)  
BOIES, SCHILLER & FLEXNER LLP  
1999 Harrison Street, Suite 900  
Oakland, CA 94612  
Tel: (510) 874-1000  
Fax: (510) 874-1460  
Email: jcove@bsflp.com

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that service of the foregoing STIPULATION TO RESET THE STATUS CONFERENCE TO MAY 3, 2016 was served on April 15, 2016 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Suzanne E. Nero

Suzanne E. Nero